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I am a veterinarian by training, currently working as a dairy manager and consultant for a group of large dairy farms in Michigan and Ohio. I have also been a dairy owner and am a member of the National Milk Producers Federation Animal Health Committee, and the Cattle Industry Working Group of the NAIS, as a representative of Continental and Select Dairy Producers, two co-operatives of large dairy producers. The following opinions are my own but also reflect those of Continental and Select. .

We support the overall objectives of the NAIS and the Program Standards to:

1. Establish a mandatory national standard and data system for identifying livestock premises.
2. Establish a uniform national standard and data system for identifying food producing animals.
3. Establish a uniform and mandatory national data system for tracking animal movements, including intrastate movements.
4. Develop the ability to trace an animal of concern through the marketing chain within 48 hours.

All livestock species should eventually be identified, but in the beginning we believe the emphasis should be placed on cattle, sheep, goats, and swine.

We strongly support the position of the NAIS Cattle Industry Working Group calling for identification of all cattle with ISO-compliant Radio Frequency Identification Devices (RFID), while recognizing that they are not perfect and that better technology might come along. It is absurd to think of an inspector in a slaughterhouse trying fifteen different readers before he or she can figure out which one will work on a given animal. A technologically neutral stance may appease various groups trying to promote their own technologies, but will result in chaos, not a workable system.

We strongly support making the NAIS mandatory for cattle by January, 2009. The recent identification of a BSE cow in Texas has once again brought the necessity for rapid traceback into the mass media.

While we recognize the need for confidentiality, we believe that federal and state animal health officials must have access to the data for purposes of planning and for training exercises even in the absence of a disease outbreak. We therefore believe that the database must be under the control of USDA. Various private groups can collect the data and use it to enhance their own industry programs, such as genetic improvement, dairy herd improvement, and source identification of animal products. But they must report the basic data (date, animal ID, premises ID, and type of event) to a federally maintained central database. These four bits of data are the only ones that need to be collected for

NAIS to meet its goals. As an interim step, only the premises of origin and a final event (antemortem inspection at slaughter or death) could be collected. This step could be accomplished by 2007.

We support making NAIS mandatory. This is the only way that the stated goal of 48h traceback can be accomplished. A food-borne disease outbreak or the presence of a foreign animal disease hurts a whole industry. Widespread support from producers cannot be expected unless they know that their competitors will also have to comply. Remember that implementing the program will involve considerable effort and expense for producers, livestock marketers, and processors. Some people will not participate in the program until they are forced to, and the best force is for them to be unable to market animals that are not identified. A corollary of a mandated program is that the data must be kept confidential and should only be used to trace animals in case of a disease event. It should not fall into the hands of a producer's competitors, ex-wives, the tax authorities, or the opponents of animal agriculture.

We support allowing private enterprises and nonprofit organizations develop services for tagging animals and reporting the data. But all must be compatible with a mandatory national system. We strongly oppose making private contractors the main custodians of the database. The basic NAIS data must be in federal hands. We would hope that on-farm dairy software could be modified to report movements, births, and deaths automatically. As a practical matter, producers should be allowed to put tags in animals just prior to movement off the premises, at least in the early stages of the program. It will be impractical to police a regulation that all animals on a farm be identified.

We believe that direct electronic data transfer would be the most effective means and must be used for the bulk of the data gathering. However there must be provisions for paper-based reporting for producers and locations where there may not be access to electronics. For example, a livestock hauler picking up an animal at a remote roadside location would have to have a way of recording movement with a paper form. Paper-based data entry has a built in delay that in itself might foil the 48h traceback goal, so it should only be necessary in a small proportion of cases. Paper forms should be easily scanned by automated equipment.

Thank you for the opportunity to comment on these program standards.